

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE PEOPLE OF THE STATE OF NEW YORK,
by LETITIA JAMES, Attorney General of the
State of New York,

Plaintiff,

Civ. No. 1:22-cv-6124-JMF

-against-

ARM OR ALLY, LLC; BLACKHAWK ,
MANUFACTURING GROUP, INC., A/K/A 80
PERCENT ARMS; SALVO TECHNOLOGIES,
INC. A/K/A 80P BUILDER OR 80P FREEDOM
CO.; BROWNELLS, INC., A/K/A BROWNELLS
OR BOB BROWNELL'S; GS PERFORMANCE,
LLC, A/K/A GLOCKSTORE OR GSPC; INDIE
GUNS, LLC; KM TACTICAL; PRIMARY ARMS,
LLC; RAINIER ARMS, LLC; AND ROCK SLIDE
USA, LLC,

**NOTICE OF MOTION TO
WITHDRAW AS COUNSEL FOR
INDIE GUNS, LLC BY
CHRISTIAN W. WAUGH AND
MARY NORBERG**

Defendants.

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of the undersigned's Motion to Withdraw as Counsel for Defendant **INDIE GUNS, LLC**, and upon the accompanying Declarations of Christian W. Waugh and Mary Norberg dated February 5, 2023, and upon all papers and proceedings in this case, the undersigned will and hereby does move this Court, before the Honorable Jesse M. Furman, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, at such date and time or other location, virtual, telephonic, or otherwise, as the Court may determine, for an order (i) permitting the undersigned to withdraw as counsel of record for Defendant **INDIE GUNS, LLC**; and (ii) granting Defendant **INDIE GUNS, LLC** thirty (30) days to find new counsel.

Dated: February 5, 2023
Orlando, Florida

Respectfully Submitted,

/s/ Christian W. Waugh
CHRISTIAN W. WAUGH, Esq.
Florida Bar No. 71093
WAUGH GRANT, PLLC
201 E. Pine Street, Ste. 315
Orlando, FL 32801
Telephone: 321-800-6008
Fax: 844-206-0245
Email: cwaugh@waughgrant.com

/s/ Mary A. Norberg
MARY NORBERG, Esq.
Florida Bar No. 1032028
WAUGH GRANT, PLLC
201 E. Pine Street, Ste. 315
Orlando, FL 32801
Telephone: 321-800-6008
Fax: 844-206-0245
Email: mnorberg@waughgrant.com

Counsel for Indie Guns, LLC

CERTIFICATE OF SERVICE

I DO HEREBY CERTIFY that the foregoing has been served on February 5, 2023 on all parties to this lawsuit, including the Plaintiff, the State of New York, by electronic service via the S.D.N.Y. CM/ECF, and also, pursuant to Local Civil Rule 1.4, on the client, INDIE GUNS, LLC, by email to icrew@indieguns.com.

/s/ Christian W. Waugh